

WDS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-11-041

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 31 U.S.C. § 5332)

YOSSEF BAREL,
also known as
"JOSSEF BAREL,"

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

TERRY McHUGH, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about January 14, 2011, within the Eastern District of New York, the defendant YOSSEF BAREL, also known as "JOSSEF BAREL," did knowingly and with the intent to evade the currency reporting requirements under Title 31, United States Code, Sections 5316(a)(1)(A) and 5316(b), conceal more than \$10,000 in currency and other monetary instruments, to wit, approximately \$112,227 in United States currency, on his person and in articles of luggage and other containers, and transport and transfer and attempt to transport and transfer such currency and monetary instruments

from a place within the United States to a place outside of the United States.

(Title 31, United States Code, Sections 5332; Title 18, United States Code, Sections 2 and 3551 et seq.)

The source of your deponent's information and the grounds for her belief are as follows:¹

1. Your deponent has been with HSI for approximately 14 years. I am familiar with the facts contained in this affidavit as a result of my participation in the investigation of the bulk cash smuggling discussed in this affidavit, which includes, but is not limited to, my review of the file and conversations with other law enforcement personnel assisting with the investigation.

2. On or about January 14, 2011, the defendant YOSSEF BAREL, also known as "JOSSEF BAREL," a citizen of Israel, attempted to board Delta Airlines flight 268 bound for Tel Aviv, Isreal, departing from John F. Kennedy International Airport in Queens, New York. As the defendant proceeded along the jetway, he was selected for an enforcement examination. Officers from Customs and Border Protection ("CBP") informed the defendant YOSSEF BAREL, also known as "JOSSEF BAREL," of the currency reporting regulations, and presented a customs form for the

¹ Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest the defendants, I have not included details of every aspect of this investigation.

defendant to read. The defendant YOSSEF BAREL, also known as "JOSSEF BAREL," was presented with CBP Publication 503 in English, which he spoke fluently.

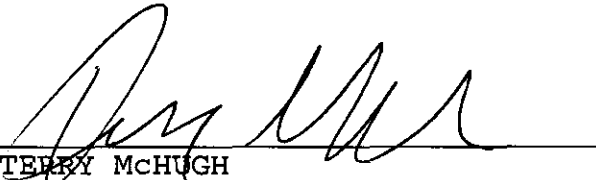
3. After the defendant YOSSEF BAREL, also known as "JOSSEF BAREL," finished reviewing the customs form, CBP officers asked him to declare all of the currency that he was transporting for himself and for any other person. CBP officers also informed the defendant that he was required to declare all currency that he was carrying in checked luggage and carry-on luggage, whether in the form of cash, checks, money orders or other negotiable instruments. The defendant then, in the presence of CBP officers, stated that he was carrying \$30,000 in United States currency. The defendant then wrote \$30,000 on the CBP Publication 503 form and signed his name. CBP officers escorted the defendant to a private area and asked the defendant to provide the \$30,000 for verification. The defendant then presented them with \$40,000 in United States currency -- in four stacks of \$10,000 each -- which he retrieved from socks in one of his carry-on bags.

4. CBP officers then conducted a further examination of the defendant, which revealed that the defendant was carrying an additional stack of \$10,000 in United States currency in his jacket pocket, as well as an additional \$12,227 in a carry-on bag. CBP officers thereafter conducted a search of the defendant's checked-in luggage, which revealed an additional

\$50,000 in United States currency hidden under the lining of the defendant's suitcase. In total, the defendant was carrying \$112,227 in United States currency.

5. The defendant was placed under arrest.

WHEREFORE, your deponent respectfully requests that the defendant YOSSEF BAREL, also known as "JOSSEF BAREL," be dealt with according to law.


TERRY MCHUGH
Special Agent
Homeland Security Investigations

Sworn to before me this
16th day of January, 2011
